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SITE CLOSURE REPORT TEMPLATE

**ANNETTE ISLAND,
ALASKA**

**FINAL
JUNE 2002**

JACOBS ENGINEERING GROUP INC.

SITE CLOSURE REPORT TEMPLATE

ANNETTE ISLAND, ALASKA

**FINAL
JUNE 2002**

Prepared for:
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**Total Environmental Restoration Contract
Contract No. DACA 85-95-D-0018
Task Order No. 14**

1.0 INTRODUCTION

This Site Closure Report Template for Annette Island Operation Clean Sweep was prepared under the U. S. Army Engineer District, Alaska (USAED) Total Environmental Restoration Contract (TERC), Contract Number DACA 85-95-D-0018, Task Order 14 for the Federal Aviation Administration.

This document provides guidance for site closure reporting and requests. Most documents included in this template were provided by Mr. Jeff Benson, Environmental Coordinator for the Annette Islands Reserve Environmental Department, in a memorandum dated December 11, 2001.

The purpose of the closure template is to provide the framework for progressing through the cleanup and closure process. This framework is made up of the following:

- General site closure requirements established by the Metlakatla Indian Community (MIC)
- Modifications to the process requested by FAA and approved by MIC and the Bureau of Indian Affairs
- Example outlines and correspondence

1.1 GENERAL SITE CLOSURE REQUIREMENTS

Attachments to this Site Closure Template include the following documents provided by Mr. Benson:

- Letter regarding Site Closure Reporting Requirements (Attachment A)
- Site Closure Report Submittal Outline (Attachment B)
- Letter regarding No Further Action Determination (Attachment C)

The following information was also included in the December 11 Memorandum:

- The format and content of these closure documents are subject to approval by the Council of the Annette Islands Reserve.
- Other documents and forms that may be required for this purpose (site closure) will be prepared by MIC and provided to agencies and other parties conducting site closure activities on an as-needed basis.
- The Site Closure Report outlined in this document is to be prepared and submitted to MIC for approval of site closure recommendations.

- The Annette Islands Reserve Environmental Department will accept Site Closure Reports for each site listed in the "Master Plan for Environmental Mitigation of the Metlakatla Peninsula" and the June 1999 C3 Plan. The Environmental Department recognizes the 87 sites listed in these plans as the official sites for MOU Work Group activities. The ultimate size and extent of these sites will be determined based on site characterization and on where contaminants have come to reside. The MIC does not intend to process closure documents for separate structures, features, or sub-sites within or separate from the official sites.

1.2 MODIFICATIONS PROPOSED BY THE FEDERAL AVIATION ADMINISTRATION

At the request of the Federal Aviation Administration, one additional component was added to the Site Closure Report Outline provided by the MIC. Appendix E: Photo Documentation of the Completion of Physical Debris and Surface Stain Removal was added to provide signed documentation that clean-up efforts aimed at physical debris and surface staining had been completed at the time of witnessing signatures.

MIC and BIA representatives will be requested to participate in a site-walk after the completion of site preparation and site remedial activities. The condition of the site at the time of the site-walk will be documented through photographic imaging. Representatives of the participating agency will witness the absence of both physical debris and surface staining by providing a signature documenting the inspection. This process will aid in addressing responsibility for any deposition of materials occurring after site preparation and remedial activities have been completed.

Attachment A
Letter Regarding Site Closure Reporting Requirements

(Example provided by MIC)

Letter Regarding Site Closure Reporting Requirements

(Date)

(Address of Agency or Party)

Subject: Site Closure Reporting Requirements

Dear _____:

A copy of an outline for the Site Closure Report (SCR) required by Metlakatla India Community (MIC) is enclosed. The SCR must be completed and submitted to the MIC Environmental Office, as described in MIC Guidelines for Cleanup and Closure of Open Dumps and Other Contaminated Sites, in order to initiate a request for "No Further Action" determination at the completion of site cleanup activities at each site identified by the MIC in the "Master Plan for Environmental Mitigation of the Metlakatla Peninsula."

The SCR must contain sufficient detail to demonstrate to the MIC that an appropriate remedial action has been completed. It is the responsibility of the agency or party conducting the cleanup action to document that the actions have restored the site sufficiently to comply with all applicable MIC Cleanup regulations. Contaminated sites are highly variable in nature, and the adequacy of the remedial actions must be determined on a site-by-site basis based on the data collected for each site.

If you have any questions regarding the completion of this Site Closure Report, please contact me at (907) 886-4200.

Sincerely,

Jeff J. Benson
Environmental Coordinator

enclosure:

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Attachment B
Site Closure Report Submittal Outline

(Example provided by MIC)



**METLAKATLA INDIAN COMMUNITY
SITE CLOSURE REPORT
SUBMITTAL OUTLINE**

This Site Closure Report (SCR) must contain, at a minimum, the following elements:

- A. Site Name and C3 Identification Number**
- B. Lead Agency and Participating Agency or Parties**
- C. Contractors**
- D. Report Date**
- E. Executive Summary**

A brief summary of the report sufficient to acquaint the reader with the subject site, the contamination problem, if any, and the remedial action completed.

F. Problem description

Description of the history of site operational activities that were probably the cause of contamination at this site.

G. Characterization

Describe the following:

- The site characterization activities that took place at this site;
- A description of the sources and types of contamination present at the site;
- The nature and extent of contaminated release including a description of all contaminant pathways;
- Description of potential human and environmental receptors; and
- The relative characteristics of these contaminants and the risks posed by these contaminants to human health and the environment.

H. Remedial Action

Describe the following:

- Actions taken to remove, contain, or neutralize the contaminants at this site;
- Cleanup standards used (cite applicable MIC cleanup regulations); and
- Description of nature and extent of contaminants remaining on the site after remedial actions.

I. Confirmation

Describe the measures taken to confirm that the contaminants remaining no longer pose a significant threat to human health or the environment, and that the remedial action fully complies with MIC cleanup regulations.

J. Long Term Maintenance and Monitoring

Describe all long-term site maintenance activities that will be necessary to ensure the integrity of the cleanup. Describe all monitoring activities needed to verify the performance of any long-term remedial activities.

K. Determination

Based on the information presented in this Remedial Action Completion Report dated _____, the _(agency or party)_ has determined that the above described release of contaminants at the _(site name)_ no longer poses a threat to human health or the environment; and the concentrations of contaminants remaining at the site do not exceed any of the applicable Metlakatla Cleanup Levels or any other applicable, relevant, or appropriate federal regulations. Further, the remedial actions described above are complete.

This determination applies only to the sites and the remedial action summarized in this Remedial Action Completion Report.

Lead Agency or Party

Date

Name of Authorized Representative

Signature

L. Concurrence

Metlakatla Indian Community Environmental Office

Date

M. Noted

Director, Northwest Region, Bureau of Indian Affairs

Date

N. References

O. Appendices

- A. Hazardous Waste Manifests
- B. Landfill Disposal Documentation
- C. Laboratory Analytical Reports
- D. Site Remediation Report
- E. Photo Documentation of the Completion of Physical Debris
and Surface Stain Removal (added by FAA)

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Attachment C
Letter Regarding No Further Action Determination

(Example provided by MIC)



Letter Regarding No Further Action Determination

(Date)

(Address of Agency or Party)

Subject: (Site Description and Location)

Dear _____:

Thank you for submitting the Site Closure Report (SCR) dated _____ for review by the Metlakatla Indian Community (MIC) Environmental Office. The MIC appreciates your initiative in pursuing these cleanup response activities.

The MIC Environmental Office has reviewed the SCR and the following information regarding this site remediation work:

- 1.
- 2.
- 3.
- etc.

Based upon the information presented in the reports listed above, the MIC Environmental Office has determined that the presence or release of remaining contaminants into the air, soil, and groundwater at this site no longer poses a significant threat to human health or the environment.

Therefore, the MIC Environmental Office has determined that no further remedial action is necessary at this site. This No Further Action determination is made only with respect to the releases identified in these response actions, and applies only to the area of the property affected by the releases identified in the above referenced reports. It does not apply to any other releases or potential releases at the property not addressed by these response actions. The MIC reserves the right to require additional response actions should new information become available in the future that reveals other potential threats to human health or the environment at this site.

If you have any questions, please contact me at (907) 886-4200.

Sincerely,

Jeff J. Benson
Environmental Coordinator

